



U.S. DEPARTMENT OF
ENERGY

BOEM
Bureau of Ocean Energy
Management

Atlantic Offshore Wind Transmission Preliminary Findings and Recommendations

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March 22, 2023



Immediate Recommendations



Immediate Actions before 2025		
★★★★	Multi-State Offshore Wind Transmission Collaborative	1.1.1.
★★★★	Regional Transmission Planning Collaborative	1.1.2.
★★★★	Tribal Nation Engagement	1.1.3.
★★★★	Systematic Evaluation of POI Capacities	2.1.2.
★★★★	NERC Reliability Standards Around Offshore Transmission	2.3.1.
★★★	Voluntary Cost Allocation Assignments	4.1.1.
★★	'Network-Ready' Equipment Standards	3.1.1.
★★	Equipment Rating Standardization for Transmission Components	3.1.2.
★★	R&D for Offshore Transmission Technology Commercialization	3.3.1.
★★	Expansion of Domestic Supply Chain and Manufacturing	3.4.1.
★★	Skilled U.S. Workforce Development	3.4.2.
★★	Federal-State Aligned Offshore Wind Transmission Siting	5.1.3.
★★	Guidance for Federal Environmental Review and Permitting Requirements	5.2.1.
★★	Permitting Agency Resources and Staffing	5.2.3.
★	Environmental R&D for Offshore Wind Transmission	3.3.2.
★	Relevant Federal Funding, Financing, and Technical Support	4.2.2.



Immediate Actions – Critical (★★★)

Partnerships and Collaborative Efforts

Multi-State Offshore Wind Transmission Collaborative

- An Atlantic coastal state Offshore Wind Transmission Collaborative would offer the opportunity to establish a shared vision on policy and coordination issues for offshore transmission development
 - Should be started now to prepare to provide input on planning action for multi-state transmission to the ISOs/RTOs

Regional Transmission Planning Collaborative

- We encourage JIPC, with continued support of the RTOs and nonregulated states, to work with the new state collaborative to include state policy goals for offshore wind and interregional transmission in their planning work. The results from the National Labs in the AOSWTS may support these interregional planning efforts once they are complete and published.

Offshore Wind Transmission Task Force

- We recommend BOEM establish a transmission task force for Federal agencies, Tribal Nations, state & local governments to discuss the siting and alignment of permitting processes of specific proposals for regional offshore wind transmission development.

Immediate Actions – Critical (★★★) Systematic POI Evaluation

We encourage RTOs and transmission planners to systematically identify and prioritize alternatives to each POI and landing site requested by interconnection applicants, based on AC power flow characteristics, and to plan for and facilitate construction of infrastructure necessary to facilitate POIs that will most efficiently use limited landfall sites and minimize long run costs and environmental impacts.

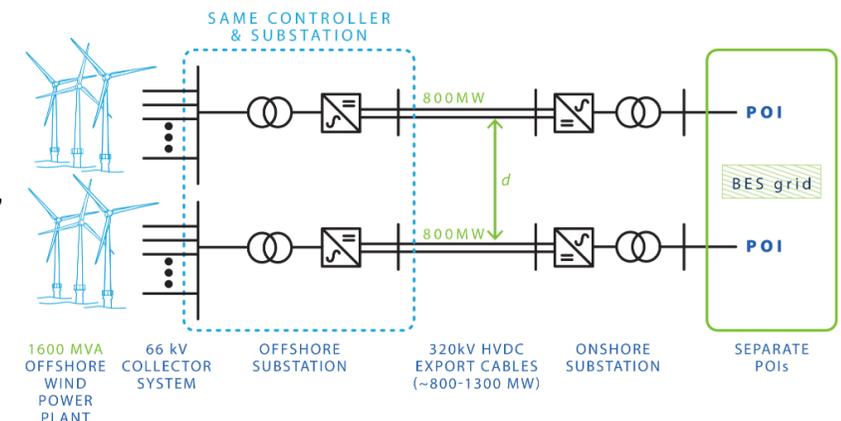
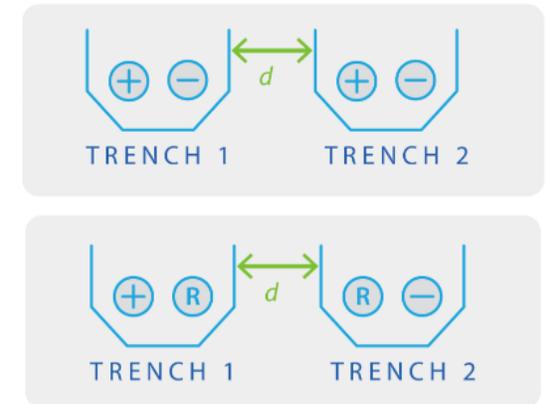
- ▶ To support this evaluation process, we recommend that DOE publish the POI identification methods from the AOSWT study for transmission planners to consider and recreate in their own study work going forward.
- ▶ Recommend transmission planners utilize interregional groups (such as JIPC or EIPC) to highlight to industry those POIs which are best suited for offshore HVAC/HVDC networks.
- ▶ Recommend states include RTO-identified POIs in any transmission solicitations for state procurement.



Immediate Actions – Critical (★★★) Clarify Reliability Standards

We recommend that a Standard Authorization Request (SAR) be submitted by industry representatives to NERC on the topics listed below as soon as possible to address these gaps. While FERC could also initiate these requests by submitting a proposal to NERC under FPA Section 215, the submission of a SAR with industry support will be the most expedient way to get these clarifications made.

- TPL-001-5 , the maximum lateral separation distance between buried cables within which a common mode of failure, multiple contingency (N-1-1) is credible should be defined
- TPL-001-5 definition of P7 (i.e., N-1-1) contingency should be updated to include the maximum lateral separation distance between buried HVDC bipole with DMR cables within which a common mode of failure, multiple contingency (N-1-1) is credible
- A precise definition is needed for NERC TPL-001-5 for the non-capitalized, undefined term “generator” within the context of large offshore wind power plants.



Immediate Actions – Critical (★★★)

Voluntary Cost Allocation Assignments

“Voluntary Agreements can further those goals by, for example, providing states with a way to prioritize, plan, and pay for transmission facilities that, for whatever reason, are not being developed pursuant to the regional transmission planning processes required by Order No. 1000.3 In addition, in some cases, Voluntary Agreements may allow state-prioritized transmission facilities to be planned and built more quickly than would comparable facilities that are planned through the regional transmission planning process(es)”

– FERC Docket No. PL21-2-000

We encourage states and RTOs to pursue voluntary cost allocation based on a mutually agreed-upon method. The following best practices have been identified for cost assignment:

- ▶ Voluntary funding agreements, through which one or more state regulatory entities and/or public utility transmission providers may agree to accept all or part of the cost burden for a specific facility, can provide a mechanism through which beneficial infrastructure can be built where that infrastructure may not otherwise have had a pathway to be planned and paid for.
- ▶ System operators to examine the viability and consequences of grant the state(s) sponsoring a project through a voluntary funding agreement exclusive or priority access to the transmission asset on market competition and system reliability, particularly during periods of system stress.
- ▶ Public utility transmission providers to include in their tariff a pre-defined regional cost allocation method for regional transmission projects as a back stop for agreements made by states.

Immediate Actions – Recommended (★★)

‘Network-Ready’ Equipment Standards

- ▶ We recommend RTO groups (e.g., JIPC) design and expand ‘Network-Ready’ equipment standards of both HVAC and HVDC subgroups, using NYPSC’s standards as a starting point but adding specificity in terms of design requirements. These standards should be in place to enable future expansion as new lease areas are identified.
- ▶ We recommend that the Offshore Wind Federal-State Partnership or multi-state collaborative then take the lead to drive enforcement of standards within member states. States then could require projects to comply with specifications or through offshore wind mandates of PSC transmission permits.

Equipment Rating Standardization for Transmission Components

- ▶ As much as possible, we recommend that state solicitations are prescriptive to match the ‘small, medium, and large’ transmission designs that are already being utilized for European installations. Establishing equipment standards for transmission cable voltage and current capacity, connectors, and collector stations as a function of development potential and topology design will reduce burden on OEMs and transmission planners and operators.



Immediate Actions – Recommended (★★)

R&D Work for Offshore Transmission Technology Commercialization

- We recommend DOE continue supporting R&D through the national labs and in partnership with academia and industry to address key technology gaps - particularly HVDC, floating transmission components, and capabilities of inverter-based resources .

Expansion of Domestic Supply Chain and Manufacturing

- We recommend that equipment manufacturers expand domestic facilities to support OSW project demand in the U.S. to increase local equipment production and develop a skilled workforce.
- We recommend that OSW project developers reach out to transmission asset manufacturers early. Both to plan for long lead time items in their proposals and to signal market need to the original equipment manufacturers.
- Support for the all-of-government approach to OSW Domestic Supply Chain. We find the agencies' ongoing activities to be helpful in supporting the OSW Transmission supply chain needs

Skilled U.S. Workforce Development

- We encourage U.S. employers to dedicate specific focus and funding to attract and retain a skilled, trained, and diverse workforce. Offering paid internships and apprenticeships to new workers, students, and recent graduates can increase interest and experience of early career workers and facilitate a pipeline of workers for succession planning.
- We encourage U.S. community colleges, vocational trade schools, graduate, and post-graduate educational institutions to offer additional classes and programs focused on transmission and power systems, particularly HVDC and offshore systems, in order to produce more early career workers.

Immediate Actions – Recommended (★★)

State-Federal Aligned Siting

- We recommend DOE work with BOEM to conduct and publish a siting study based on networked 2050 AOSWTS topologies and share that information with states and RTOs to be included in state planning efforts. Routes identified on the Outer Continental Shelf would be further refined and vetted using Marine Spatial Planning and survey data during BOEM grant/lease planning.

Provide Guidance for Permitting Procedures and Requirements

- There is a need to develop federal guidance regarding authorization/permitting procedures and requirements for intra- and inter-regional transmission solutions where there is no authorization/permitting precedent
- We recommend that DOE, state siting authorities, and local communities consider how grant funding under the IRA funded Transmission Siting and Economic Development (TSED) grant program can be help support the development of permitting guidance.

Permitting Agency Resources & Staffing

- Ensure that state and local agencies with regulatory authority and/or special expertise have the required resources, including staffing levels and technology to efficiently review an increased number of projects.
- We recommend that DOE, BOEM, and other federal agency partners, explore and implement funding mechanisms to support the capacity of often resource-constrained Tribal Nation and local governments to meaningfully engage in the environmental review and permitting process.
- For federal agencies, direct hiring authority is recommended for expedient and effective hiring of needed staff.

Immediate Actions – Best Practices (★)

Environmental R&D for Offshore Wind Transmission

- We encourage continued interagency work on R&D and scientific research specific to transmission siting or environmental impacts.

Relevant Federal Funding, Financing, and Technical Support

- With the current administration’s ambitious clean energy targets and the unprecedented levels of funding support brought through the Bipartisan Infrastructure Law and Inflation Reduction Act, federal agencies are unifying to support transmission infrastructure development. We recommend developers and states looking to develop OSW transmission projects carefully review and apply for existing and upcoming funding programs to access BIL & IRA funding.



2025-2030 Recommendations



Partnerships & Collaborations



Planning & Operations



Technologies & Standardization

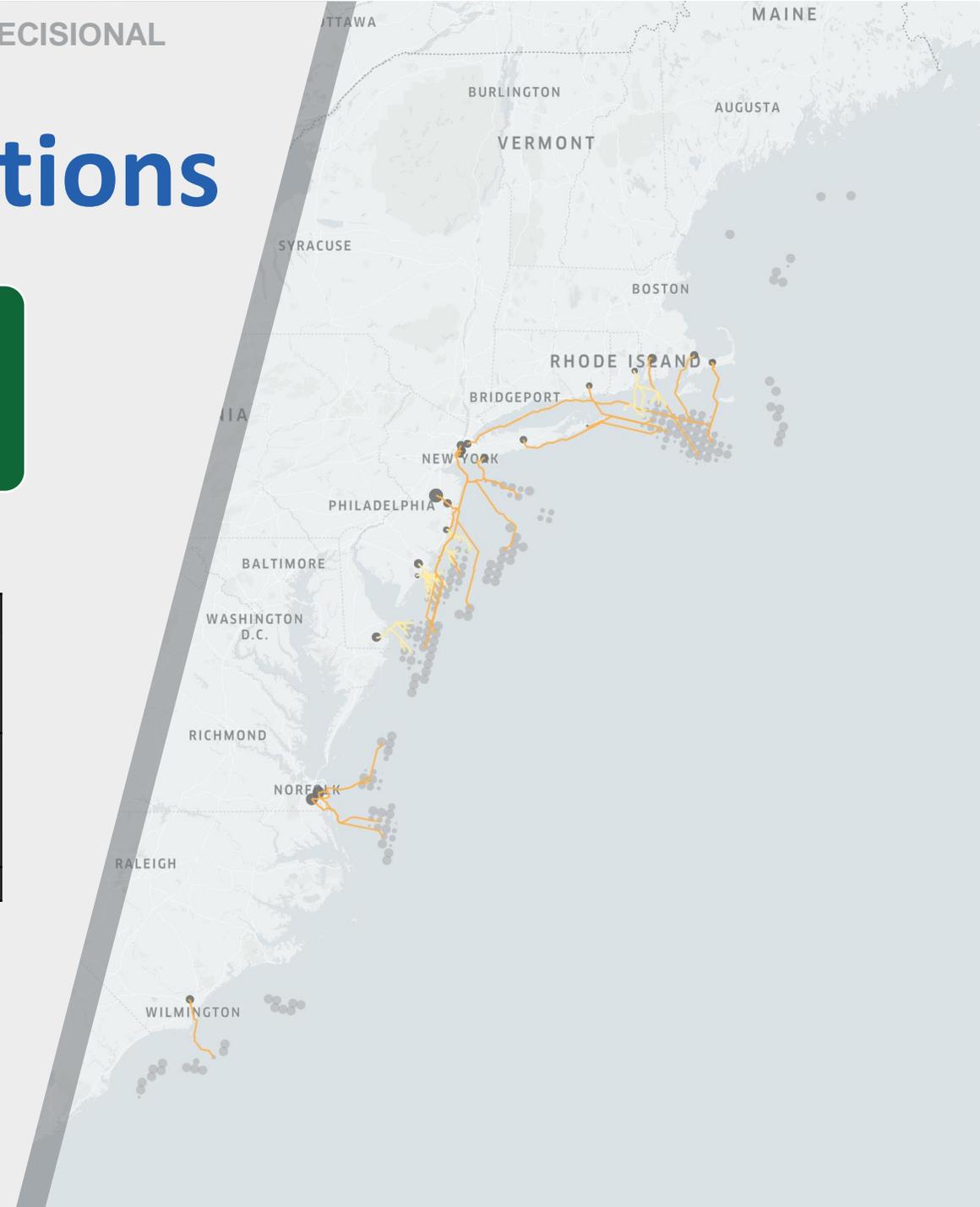


Economics & Support Initiatives



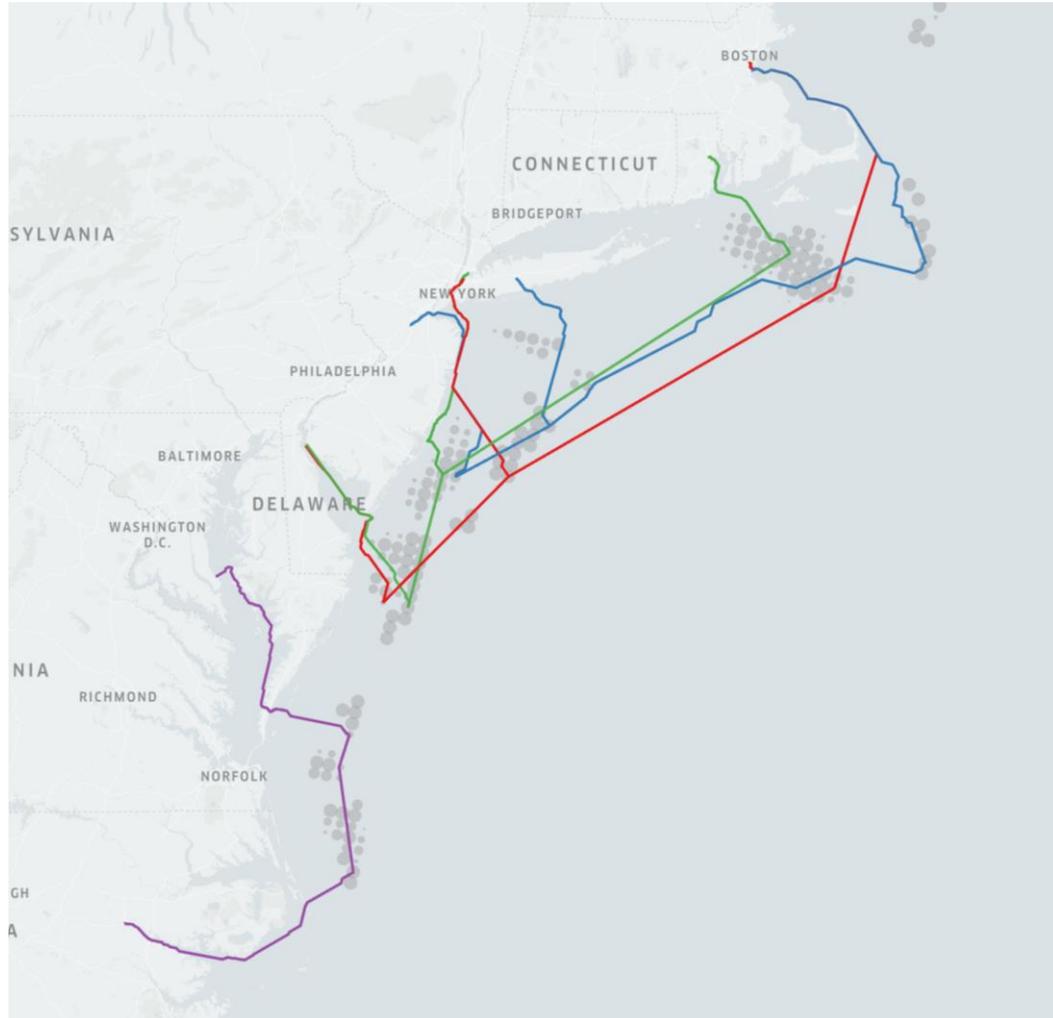
Siting & Permitting

Near-term Actions for 2025 – 2030		
★★★★	Interregional Offshore Topology Planning	2.2.1.
★★★★	HVDC Standards Development	3.2.1.
★★★★	Federal Preferred Routes for Transmission in the Outer Continental Shelf	5.1.1.
★★★	Regulatory Guidance for Ownership of Network-Ready Projects	2.4.2.
★★★	Data sharing for Interoperability of HVDC offshore systems	3.2.3.
★★★	BOEM Competitive Right-of-way Grant Issuance Process for Preferred Routes	5.1.2.
★★★	Neighboring States Achieve Renewable Portfolio Standard and Offshore Wind Goals	5.1.4.
★	Community Benefit Agreements	5.2.5.



2025-2030 Actions – Critical (★★★)

Interregional Offshore Topology Planning



- We recommend the Multi-State Offshore Wind Transmission Collaborative communicate support for interregional HVDC transmission topology strategies (such as those identified by the AOSWTS) to their respective transmission planning entities and participate in conversations about benefits evaluation and cost allocation for identified interregional projects.
- We recommend the JIPC to lead a collaborative study process between the RTOs and planners in non-RTO neighboring regions to include these interregional interlinks in their regional plans based on state policy.



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2025-2030 Actions – Critical (★★★)

HDVC Standards Development

Equipment Standards

- Basic equipment requirements are defined by IEEE 1899-2017 for control equipment, protection equipment, and auxiliary secondary equipment with a voltage range of up to 800 kV. However, an effort to consider the functional requirements of HVDC equipment within the context of grid codes encountered by Atlantic coast offshore wind projects would provide guidance for equipment manufacturers and transmission planners. Further, system-based functionality requirements may also permit interoperability across manufacturers and vintage years of equipment

Operability Standards

- Like equipment standards, HVDC operability standards are relevant to radial as well as networked topologies. To optimize the flexibility of HVDC networks, topologies which evolve beyond radial interties are needed. This means that more than a single offshore and single near-shore HVDC converter station will be required to function in a coordinated fashion. Though single-vendor, multi-terminal HVDC networks are possible and perhaps even likely early in the development of the supply chain, cost effectiveness and scale will be best realized through a market-driven model that requires multi-vendor interoperability.

To further this work, we recommend an industry survey be undertaken to identify any existing standards and review common OSW transmission equipment ratings to date to identify gaps and any issues of incompatibility.



2025-2030 Actions – Critical (★★★)

Federal Preferred Routes for Transmission in the OCS

- We recommend BOEM continue to work with DOE, and other permitting agencies to identify preferred transmission routing paths, based in part on transmission topologies identified in the AOSWTS to accommodate long-term OSW deployment goals.
- Corridors/routes that are identified as ‘preferred’ could receive federal funding from DOE, other federal agencies, and/or congressional appropriations to conduct geophysical surveys and geotechnical investigations to provide needed data for use in the permitting process. This data would be provided to lessees, and potential grantees, for use in BOEM’s review and authorization of easements and/or rights-of-way (ROWs).



2025-2030 Actions – Recommended (★★)

Regulatory Guidance for Ownership of Network-Ready Projects

- We recommend that transmission providers and stakeholders work with FERC to investigate the need for and design of specific grid contracts and regulations for offshore networks to cover topics including shared use and ownership agreements, transmission rights, open access agreements and cost allocation for shared and networked offshore facilities across multiple POIs. While multiple regions may need different policy solutions, consistent approaches between regions will be desirable, where possible.

Data Sharing for Interoperability of HVDC Offshore Systems

- We recommend transmission planning entities give special focus to perform interoperability studies around HVDC and identify modeling and data needs. There will be a need to establish guidelines or even standards for the parameters, models, interface definitions, and other pertinent information that need to be exchanged between vendors for operation of their equipment within the larger system. While working with commercially proprietary data, there may be additional need to codify the frequency and method of data exchange.
- We recommend OEMs provide data to ISOs/RTOs for interoperability studies, lead the legal and contractual work to establish a multi-vendor cooperation framework, and actively look to standardize components when reasonable. There may be a need to address liability in cases of a multi-vendor systems and OEMs may want to put forward guidelines as to what type of measures and logs should be kept in order to do so.
- We recommend that the industry at large work to establish common terminology and definitions for HVDC components or functions such that vender-specific branding does not impede our ability to communicate about this technology.



2025-2030 Actions – Recommended (★★)

BOEM Right-of-Way Grant Issuance Process for Preferred Routes

- Building off the identification of preferred routes, we recommend that BOEM issue one or more RFCIs to determine interest in regional transmission systems utilizing ROW and/or right-of-use and easements (RUE) as needed. These RFCIs could be for intra- or interregional systems where capacity and technology minimums are specified.
 - would also include an RFI component to obtain feedback on preferred technology standards and contractual obligations associated with the issuance of the ROW
- BOEM could incorporate due diligence requirements including but not limited to requirements and/or associated penalties for failing to progress through BOEM’s regulatory framework within a specified schedule.

Assisting Neighbor States Through RPS & OSW Goals

State Renewable Portfolio Standards (RPS) are a key driver of U.S. clean energy policies. State RPS and offshore energy commitments can be used to incentivize integrated planning and promote the most efficient siting decisions.

- We recommend state RPS or OSW goals be amended to allow for full or partial credit of a state’s own goals when an investment in OSW infrastructure helps a neighboring state achieve its goals. By incentivizing states to support the siting of cable landfall of a neighbor state, there is potential to reduce state border disputes and competition, by promoting shared benefits. By allowing cable landfall or approving onshore transmission within their jurisdiction, one state may enable the OSW benefits for another state and increase common goals.



2025-2030 Actions – Best Practices (★)

Community Benefit Agreements

Community Benefit Agreements, or CBAs, are one way to help bring local communities into a sustained focus and to ensure that communities impacted by infrastructure are net beneficiaries. CBAs between project developers and impacted communities can play a positive role in helping to ensure that developers are affirmatively reaching out to communities and committing to provide benefits suited to each community's unique needs.

- We recommend the use of a CBA signed by a community benefits group and an energy project developer identifying community benefits that the developer agrees to provide as part of the project's development, in return for the community's support of the project.
- We recommend involvement from state and local leaders to help the process associated with CBA development by ensuring fairness, accuracy in information provided and adequate outreach.



2030-2040 Recommendations



Partnerships & Collaborations



Planning & Operations



Technologies & Standardization

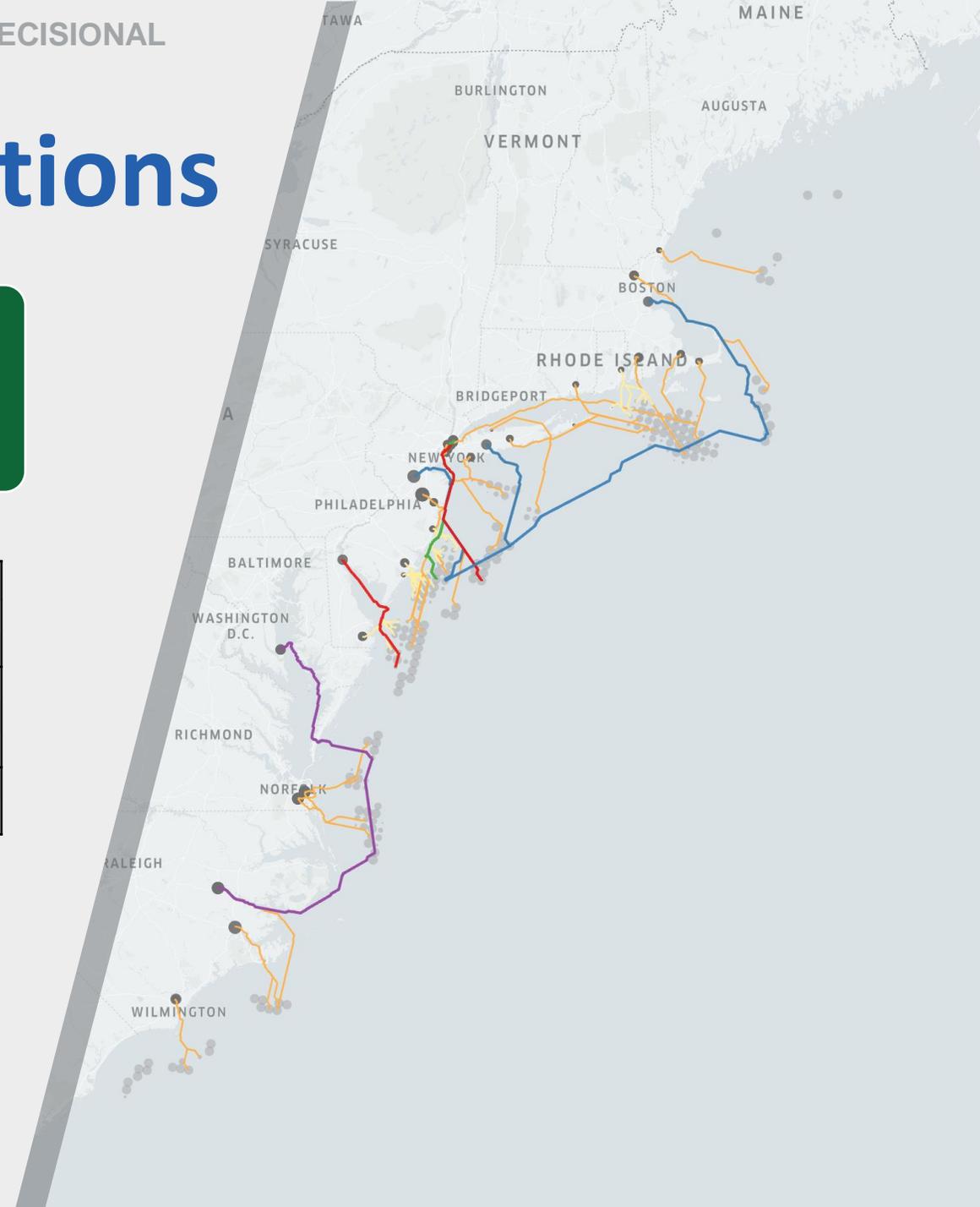


Economics & Support Initiatives



Siting & Permitting

Mid-term Actions for 2030 – 2040		
★★★★	Multi-Terminal HVDC Test and Certification Center	3.2.2.
★★★★	Environmental Review and Permitting Frameworks	5.2.2.
★★★	Regulated Interregional Joint Planning Processes	2.2.2.
★★★	Interregional Transfer Capacity Minimums	2.3.2.
★★★	Offshore Cables and Substations for Continued Use as Shared Infrastructure	5.2.4.
★★	Interconnection Queue Process Reform	2.4.1.
★★	Enhancement of Existing Market Monitoring Roles	2.4.3.



2030-2040 Actions – Critical (★★★)

Multi-Terminal HVDC

Test & Certification Center

As multi-terminal HVDC (MTDC) grids are developed, it is likely that interactions between HVDC components from different vendors and the interactions with other connected AC devices will need to be studied carefully to assure adequate tuning of controllers and protection device settings. There is currently no testing or certification center in the U.S. with the capability to test these potential interactions and ensure compatibility before they are installed. This is a national gap and while testing at international facilities may be used as a failsafe in the near future, it is highly recommended that a domestic center of excellence be established.

Further, it is recommended that the testing center be independent of any one original equipment manufacturer to eliminate any perceived bias and reduce data sharing or competitive market concerns.



2030-2040 Actions – Critical (★★★)

Environmental review and permitting frameworks

- We recommend that the environmental review and permitting requirements of each entity at each jurisdiction be well understood and coordinated, with a comprehensive permitting timetable schedule developed as part of a coordinated project plan, particularly where multiple projects would affect each others ability to interconnect to the grid. This should include project specific roles and authorities, primary points of contact, and public engagement schedules
- We recommend that BOEM, as the lead federal agency in the review of offshore transmission infrastructure, continue to work closely with Tribal Nations to identify potential natural, archaeological, and cultural resources and areas of historic and cultural or religious significance early, though the National Historic Preservation Act, and Government to Government consultations.
- For offshore wind projects that qualify to become covered projects under FAST-41, we recommend that BOEM and the Permitting Council (with the support of other Federal agency partners) encourage and facilitate Tribal Nations, state agencies, and local agencies agreeing to participate as cooperating or participating agencies in the FAST-41 process.



2030-2040 Actions – Recommended (★★)

Regulated Joint Interregional Planning Processes

Current joint interregional coordination processes need to be enhanced to take a broader view of project needs and benefits, as FERC Order 1000 only requires ‘coordination’ between regions, which falls short of the true need for holistic planning.

We advocate for firmer regulation and support FERC’s consideration of the issue to provide a ready mechanism by which states can:

- Study collective transmission needs across two or more states that span multiple regions, considering transmission facilities that are already planned in the relevant region or regions (i.e., account for the baseline transmission plan).
- Identify transmission facilities that most efficiently or cost-effectively meet those needs.
- Allow a cost allocation method to be voluntarily determined among the participating states, including potentially among states across two or more regions.
- Ensure that the transmission facilities participating states agree to fund are incorporated into regional transmission plans (i.e., become part of the baseline regional transmission plan) so that subsequent planning studies factor in their existence (e.g., avoiding duplicative transmission facilities or facilities that are less valuable in light of the offshore wind-related transmission facilities).

Interregional Transfer Capacity Minimums

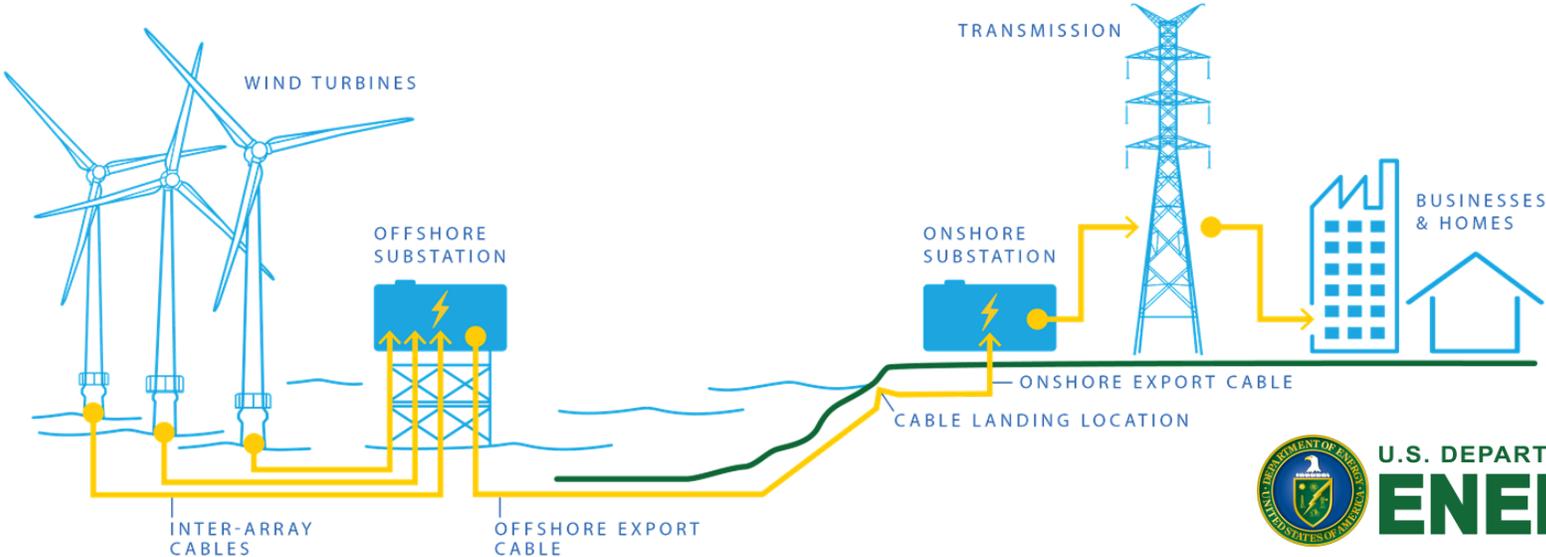
Interregional Transfer Capacity Minimums would improve resiliency, increase reliability, and combat extreme locational marginal prices across the nation but would also encourage interregional transmission projects along coastal states which could allow better ability to export offshore wind power inland.

- We encourage FERC to continue exploring the establishment of a minimum level of transfer capacity between balancing areas to encourage interregional transmission development.

2030-2040 Actions – Recommended (★★)

Assignment of Offshore Cables and Substations for Continued Use as Shared Infrastructure

- We recommend that BOEM develop guidance, or potentially regulatory revision, for the severability of the decommissioning of wind farm infrastructure and transmission infrastructure (thereby allowing the substations and export cables to remain in use beyond the individual offshore wind lease). Options may include assignment of the easement to another entity or the conversion of the easement to an independent ROW.
- We recommend that BOEM remain engaged in the international knowledge exchange agenda as the offshore wind industry matures and projects in other countries address issues associated with different life spans of project components; BOEM should work with the international community, through International Energy Agency (IEA) Technology Collaboration Programmes (TCPs) or other mechanisms, to track and contribute to research to expand the knowledge base and develop best practices. DOE should also lend its technical expertise to supporting the IEA TCPs and other international exchanges.



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2030-2040 Actions – Best Practices (★)

Reform Interconnection Queue Processes

- We recommend that FERC and the transmission planning entities prioritize the interconnection queue reform in the coming years to foster a working system for all, which will encourage offshore wind deployment to meet state and federal goals and ensure the costs for network upgrades are equitably allocated across all generation types and transmission system users.
- We recommend RTOs and transmission planners consider applications for commercial readiness requirements, such as “first-ready, first-served”, to manage their queues.
- We recommend soliciting entities, such as states with offshore wind procurements, investigate their ability to enter the queue to reserve a queue position on behalf of whatever project wins their solicitation.

DOE has ongoing work in this critical area. Read more about the i2x project and subsequent action plan specific to interconnection reform at [Interconnection Innovation e-Xchange | Department of Energy](#)

Enhance Existing Market Monitoring Roles

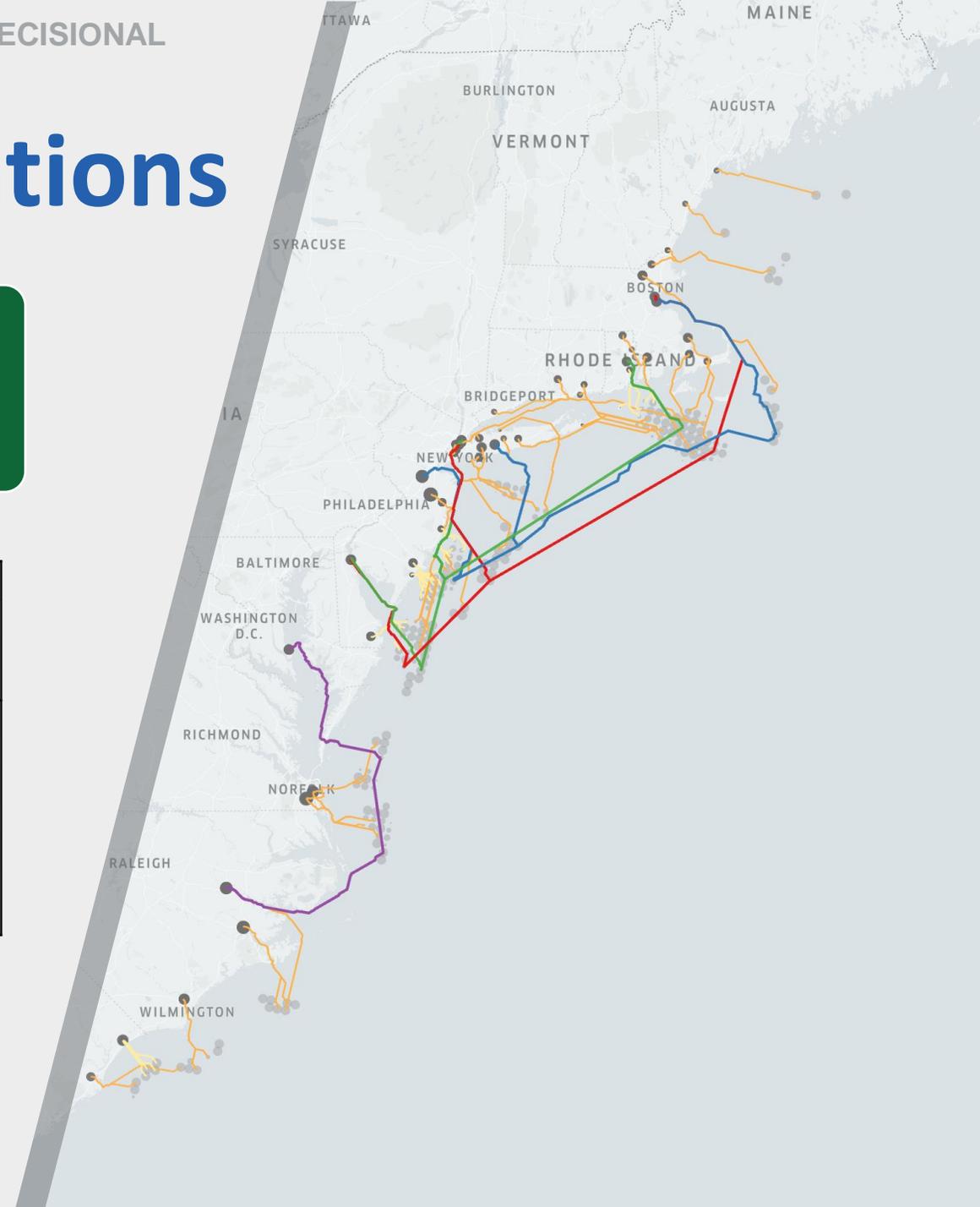
- We encourage FERC to review and, if necessary, enhance existing market monitoring roles to ensure efficient use of generation and transmission resources.



Long-Term Recommendations



Long-term Actions for Sustainable Growth		
★★	State-Led Transmission Planning	2.1.1.
★★	Cost Allocation Methodology	4.1.3.
★★	Federally Designated National Interest Electric Transmission Corridors	4.2.3.
★	International Cooperation	1.2.1.
★	Communication Practices and Public Engagement	1.2.2.
★	Transmission Optimization with Grid Enhancing Technologies	3.1.3.
★	Best Practices for Benefit Valuation	4.1.2.
★	Equity in Ratemaking	4.1.4.
★	Consumer Advocates	4.1.5.
★	Utilization of Existing Federal Facilities Along the Coast	5.1.5.



Long Term Actions – Recommended (★★)

State-Led Transmission Planning

We recommend state-led transmission planning should be pursued in partnership with local transmission operators. Tasks states may find helpful to support their transmission planning work:

- Pursue state-driven transmission procurement and interconnection processes through, for example, PJM’s State Agreement Process or ISO-NE’s Elective Transmission Upgrade process.
- Identify and name preferable Points of Interconnection to better align solutions submitted by developers with state interests.
- Make solicitations modular, similar to the approach taken in New Jersey, to allow companies to prioritize where they feel best positioned to compete.
- Develop and include incremental targets in their solicitations in addition to final capacity goals to ensure the construction schedules proposed by transmission developers align with generation investment schedules.
- Recommend modifications to state offshore wind solicitation processes to be implemented by each individual state.

Federally Designated National Interest Electric Transmission Corridors (NIETCs)

DOE may designate a NIETC to address transmission needs associated with offshore energy in federal waters. An offshore NIETC designation would allow DOE to use its authority to enter into public-private partnerships under the Transmission Facilitation Program (TFP) and may qualify for transmission facility financing through IRA Sec. 50151.

- We recommend that a NIETC is not used as a blanket to pre-select routes for a coast-wide offshore topology, but rather be designated on an as-needed basis if there are projects within a proposed corridor that would like to apply for financing available through Transmission Facilitation Program (TFP) or if the onshore implications of a NIETC would help with project permitting.

Long Term Actions – Recommended (★★)

Cost Allocation Methodology

Many cost allocation methods rely on various techniques to estimate a subset of project benefits or approximate network usage as a measure of benefits. However, no undisputable method exists.

- We recommend that the allocation of interregional transmission costs among regions should follow the regional distribution of benefits associated with the project based on a common list of benefits and methods to quantify transmission benefits among regions.
- No mechanism is recommended to compensate network users or regions that experience a lower net benefit from specific transmission projects within a cost allocation agreement. For projects of regional priority, this could be a role for federal government support.
- In cases where a new transmission facility capacity exceeds the prescribed needs of the current system, the costs for the unused portion of the facility may be distributed among all network users as network upgrade costs. This allocation will be subject to re-evaluation as the use of the facility changes and new users are prescribed so that the portion of the costs that are assigned to the network can be reduced.



Long Term Actions – Best Practices (★)

International Cooperation

- International cooperation/exchanges on transmission and consenting best practices will be key for smooth long term development of OSW.

Communication Practices and Public Engagement

- Information and jurisdiction for different aspects of offshore wind transmission can be diffuse across different types of agencies (energy offices, environmental agencies, etc.) and different levels of government (Federal, state, local). Sharing information at an early stage with all stakeholders is critical, especially with communities that may be impacted.

Transmission Optimization with Grid Enhancing Technologies

- DOE should continue to more broadly disseminate published DOE research on transmission optimization with Grid-Enhancing Technologies, with an expanded effort to inform the offshore wind transmission community about its potential applications for offshore wind.

Best Practices for Benefit Valuation

- Avoiding a cost allocation methodology that relies solely on a narrow, formulaic, understated approach to quantifying benefits, can help shift to a more holistic, multi-value benefit analysis in transmission planning.



Long Term Actions – Best Practices (★)

Equity in Ratemaking

- We encourage Public Utility Commissions to consider adopting best practice standards to ensure that low-income and vulnerable populations do not continue to be disproportionately impacted.

Consumer Advocates

- Including a consumer advocate early in the planning and decision-making process can ensure that ratepayer interests are being considered without having to bring every conversation into a public forum. Consumer advocate engagement can minimize public resistance to transmission projects, increase transparency, and lead to better outcomes that take into account the interests of ratepayers.

Use of Existing Federal Facilities Along the Coast

- We recommend exploring the use of DOD and other federal installations (e.g., U.S. Navy bases or Coast Guard stations) along the coast for cable landing sites. Opportunities exist to use dock facilities, layout yards, and other existing infrastructure to support project development.



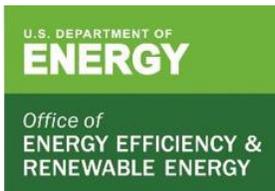
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